

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6001-CIV-GOLD

LYMUS L. BROWN, III

Plaintiff,

v.

DEPUTY D. LISANTI

Defendant.

00-6001-CIV-GOLD  
SOUTHERN DISTRICT OF FLORIDA  
CLERK'S OFFICE  
RECEIVED  
8/21/00  
JL

**DEFENDANT'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES**

Defendant, DEPUTY D. LISANTI, pursuant to Federal Rule of Civil Procedure 37 and Rule 26.1(h), Local Rules of the United States District Court for the Southern District of Florida, files this Motion to Compel Discovery as follows:

1. The Defendant, DEPUTY D. LISANTI, propounded standard form Interrogatories to the Plaintiff, LYMUS L. BROWN, III, on July 26, 2000.
2. On August 27, 2000, the Plaintiff responded to each and every Interrogatory in the same manner: "See jail file." A copy of the Defendant's Interrogatories and the Plaintiff's answers are attached hereto as Exhibit "A".
3. Plaintiff's responses are improper, unreasonable, evasive, and are intended to increase the cost of litigation.
4. Because the Plaintiff is a state incarcerated prisoner, and is currently housed

2/27/00

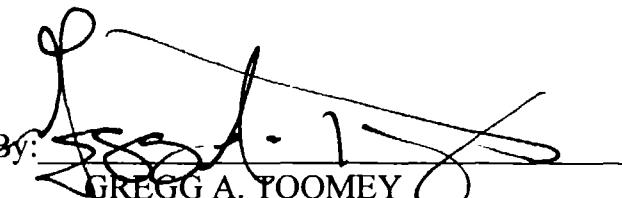
at the Liberty Correctional Institution in Bristol, Florida, counsel for the Defendant is unable to confer with the Plaintiff in an effort to secure the information requested without Court action.

WHEREFORE, Defendant, DEPUTY D. LISANTI, respectfully requests this Court to enter an Order compelling the Plaintiff to answer all of the Interrogatories propounded by the Defendant, DEPUTY D. LISANTI.

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished by U.S. Mail to Lymus Brown III DC #L24237 Liberty Correctional Institution, HCR 2, P.O. Box 144 Bristol, FL 32321 this 17<sup>th</sup> day of September, 2000.

Respectfully submitted,

BUNNELL, WOULFE, KIRSCHBAUM,  
KELLER & MCINTYRE, P.A.  
Attorneys for Defendant  
888 East Las Olas Blvd., 4th Floor  
Fort Lauderdale, Florida 33301  
Telephone: (954) 761-8600  
Facsimile: (954) 463-6643

By:   
GREGG A. TOOMEY  
Florida Bar No. 0159689

IN THE UNITED STATES DISTRICT COURT  
FOR THE FORTY-EIGHTH DISTRICT OF FLORIDA

4:05:00 09-6321-CIV-GOLD

Lynus L. Brown, III

Plaintiff

v.

Deputy C. L. GRIFFIN

Defendant

PLAINTIFF'S NOTICE OF SERVICE OF

RESPONSE TO DEFENDANT'S INITIAL INTERROGATORIES

Plaintiff, Lynus L. Brown, III, please responds the attached  
answer to interrogatories to Defendant Deputy C. Griffin,  
within month.

I HEREBY CERTIFY that a true and correct copy of the  
aforegoing has been furnished to counsel for the  
Defendant by regular U.S. mail, this 27<sup>th</sup> day of August,  
2000.

Respectfully submitted,

Lynus L. Brown, III  
Lily Correctional Institution  
#P-1144  
Bristol, Florida

AUG 31 2000

EXHIBIT A

INTERROGATORIES TO PLAINTIFF

1. Please indicate the name and address of any and all witnesses with knowledge or information relevant to your claim. For each witness identified, state the nature and substance of the knowledge he or she may have.

*see Trial File!*

2. Describe each injury for which you are claiming damages in this litigation specifying the part of your body that was injured, the nature of the injury, and as to any injuries you contend are permanent, the effects on you that you claim are permanent.

*see Trial File!*

AUG 31 2000

3. State the names and addresses of all health care providers (including but not limited to physicians, chiropractors, podiatrists, dentists, psychiatrists, psychologists, visiting nurses, hospitals, clinics, drug and or alcohol rehabilitation centers and ambulatory care centers) involved in your care, treatment or examination in the last five (5) years and, as to each, state the date and nature of the ailment, injury, illness or other reason for which care, treatment or examination was required and the nature of any operations performed.

*See Trial File!*

4. Set forth each and every fact which you believe supports your claim against DEPUTY LISANTI.

*See Trial File!*

5. Set forth each and every fact which you believe supports your claim against any agent, servant or employee of BROWARD SHERIFF'S OFFICE.

*See Trial File!*

- 6 Please list all dates of incarceration (including the dates you were booked and dates you were released) and the name and address of all places at which you have been incarcerated in the last five (5) years.

*See Jail File!*

7. Please identify all documents relevant to the subject matter of the action. Include for each such document a general description of the document, its location, its date and the custodian of such document.

*See Jail File!*

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LYMUS L. BROWN, III

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

LYMUS L. BROWN, III being duly sworn upon oath deposes and says that he is the Plaintiff in the aforementioned case, and that the foregoing answers to Interrogatories are true and correct to the best of his knowledge, information, and belief.

The foregoing instrument was acknowledged before me this \_\_\_\_ day of \_\_\_\_\_ 2000, by LYMUS L. BROWN, III who is (personally known to me)(or who has produced) \_\_\_\_\_ (as identification) and who (did/did not) take an oath.

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(Signature of Notary)

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(Name of Notary Typed.  
Printed or Stamped)

NOTARY PUBLIC

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(Commission Number)

I HEREBY DECLARE UNDER PENALTY that I have the foregoing and that the facts contained herein are true and correct.

Date: 8/27/00

LSI Lyman L. Brown, III  
\_\_\_\_\_  
Lyman L. Brown, III.